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Atorneys for Defendant
AMERICAN EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

12 SANDRA VERMA,) Case No. 08-CV-02702 SI
13 Plaintiff,)
14 v.) Judge: Hon. Susan Illston
15 AMERICAN EXPRESS, a New York) Ctrm.: 10, 19th Floor
corporation; and DOES 1-25, inclusive,)
16 Defendants.)
17 _____)
) **STIPULATION AND [PROPOSED]**
) **ORDER EXTENDING EXPERT**
) **DISCOVERY DEADLINES**
) Action Filed: April 17, 2008
) Trial Date: September 21, 2009

1 Plaintiff Sandra Verma (“Plaintiff”) and defendant American Express Travel Related
2 Services Company, Inc. (“TRS”), by and through their respective counsel of record in this action,
3 hereby present the following Stipulation and Proposed Order extending the deadlines pertinent to
4 expert discovery in this case as follows:

5 WHEREAS, Plaintiff filed this action on April 17, 2008;

6 WHEREAS, this case is currently set for trial beginning September 21, 2009;

7 WHEREAS, the current deadline for the parties to designate their respective experts
8 pursuant to Federal Rule of Civil Procedure 26(a)(2) is April 20, 2009;

9 WHEREAS, the Court indicated at the Case Management Conference held in this matter on
10 March 20, 2009 that it would consider a stipulation by the parties seeking an order extending the
11 deadlines pertinent to expert discovery in this case;

12 WHEREAS, the parties agree that, given the current status of the litigation, extending the
13 current deadlines pertinent to expert discovery in this case as set forth below will best facilitate the
14 efficient handling of this litigation going forward;

15 WHEREAS, pursuant to Northern District Civil Local Rule 6-2(a), the Declaration of
16 Connor J. Moyle in support of the parties’ Stipulation and Proposed Order is filed concurrently
17 herewith;

18 WHEREAS, the parties jointly stipulate, pursuant to Northern District Civil Local Rules
19 6-1(b) and 6-2, to request that the Court issue an order extending the deadlines pertinent to expert
20 discovery in this matter as set forth below:

21 IT IS HEREBY STIPULATED BY AND BETWEEN THE PARTIES AND THEIR
22 COUNSEL OF RECORD THAT:

23 (1) The deadline for the parties’ respective designation of experts pursuant to Federal
24 Rule of Civil Procedure 26(a)(2), currently set for April 20, 2009, shall be extended to June 8,
25 2009;

26 (2) The deadline for the parties’ respective designation of rebuttal experts, currently set
27 for May 1, 2009, shall be extended to June 19, 2009;

28 (3) The expert discovery cut-off date, currently set at June 22, 2009, shall be extended

1 to August 10, 2009.

2 IT IS SO STIPULATED.

3 Dated: April 10, 2009

CARLTON DiSANTE & FREUDENBERGER LLP
Leigh A. White
Connor J. Moyle

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6 By: /S/- Connor J. Moyle

Connor J. Moyle

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Attorneys for Defendant
AMERICAN EXPRESS TRAVEL RELATED SERVICES
COMPANY, INC.

8

Dated: April 10, 2009

PIERCE & SHEARER LLP

Andrew F. Pierce
Stacy A. Smith

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12 By: /S/- Stacy A. Smith

Stacy A. Smith

13

Attorneys for Plaintiff
SANDRA VERMA

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16 IT IS HEREBY ORDERED THAT:

17 (1) The deadline for the parties' respective designation of experts pursuant to Federal
18 Rule of Civil Procedure 26(a)(2), currently set for April 20, 2009, shall be extended to June 8,
19 2009;

20 (2) The deadline for the parties' respective designation of rebuttal experts, currently set
21 for May 1, 2009, shall be extended to June 19, 2009;

22 (3) The expert discovery cut-off date, currently set at June 22, 2009, shall be extended
23 to August 10, 2009.

24

25 PURSUANT TO STIPULATION, IT IS SO ORDERED.

26 Dated: _____


The Honorable Susan Illston
Judge of the United States District Court for
The Northern District of California